

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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WE THE PROTESTERS, INC., d/b/a
CAMPAIGN ZERO, a Delaware
Nonprofit Corporation, and STAY
WOKE, INC., a Delaware Nonprofit
Corporation,

Plaintiffs,

22 Civ. 9565 (JPC) (GS)

-against-

ORDER

SAMUEL SINYANGWE and MAPPING
POLICE VIOLENCE, INC., a California
Nonprofit Corporation,

Defendants.

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GARY STEIN, United States Magistrate Judge:

For the reasons stated on the record at the discovery conference held on April 15, 2025, the parties' outstanding discovery disputes (Dkt. Nos. 76, 77, 85, 89, 92–95, 99) are hereby resolved as follows:

1. Plaintiffs-Counterclaim Defendants ("Plaintiffs") shall make Mr. Rad available for a Rule 30(b)(6) deposition on Topic No. 7.
2. Defendants-Counterclaim Plaintiffs ("Defendants") shall produce communications with the eight (8) donor organizations in question (CASH Music, The Rosenberg Foundation, Echoing Green, The Roddenberry Fellowship, The Tides Foundation, Everytown For Gun Safety Support Fund Inc., Arnold Ventures, and Pershing Square Foundation), as requested and described in Plaintiffs' letter dated January 30, 2025 and Exhibit E thereto. (Dkt. No. 76 & 76-5). Plaintiffs do not need to waive any rights they may have to seek additional documents to which they are entitled as a condition of receiving this production.

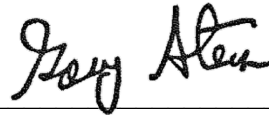
3. Defendants shall produce the grant agreement with the Seattle Foundation and communications with the Seattle Foundation concerning the grant on or before the date of the grant agreement (including communications involving agents or representatives of Defendants and/or the Foundation)

4. Defendants shall produce documents responsive to Request No. 3 in Plaintiffs' Second Set of Requests for Production concerning Form 990 filings (to the extent not already produced). (Dkt. No. 95-3 at 7). Plaintiffs' request to compel production of the other documents requested in their Second Set of Requests for Production is denied.

5. The fact discovery deadline is hereby extended to May 30, 2025.

SO ORDERED.

DATED: New York, New York
April 21, 2025

A handwritten signature in black ink, appearing to read "Gary Stein", is written over a horizontal line.

GARY STEIN
United States Magistrate Judge